

EXHIBIT 1



"I will stand for my client's rights.
I am a trial lawyer."
—Ron Motley (1944–2013)

Linda Singer
Licensed in DC, NY
direct: 202.386.9626
lsinger@motleyrice.com

September 29, 2020

VIA ELECTRONIC MAIL

Via email to mike.stuart@usdoj.gov

Mr. Michael B. Stuart
Assistant U.S. Attorney
Robert C. Byrd US Courthouse
300 Virginia Street
Charleston, WV 25301

RE: *City of Huntington and Cabell County Commission v. AmerisourceBergen Drug Corp., et al.*,
Case No. 3:17-cv-01362 (S.D.W.V.)
CT2 Plaintiffs' Trial Subpoena

Dear Mr. Stuart:

I write on behalf of the City of Huntington and the Cabell County Commission ("Plaintiffs") to notify the Department of Justice of Plaintiffs' intent to call Joseph Rannazzisi as a witness in the trial in the above captioned case, which begins on October 19, 2020. Mr. Rannazzisi is currently the only DEA witness whose appearance Plaintiffs request at trial.

Mr. Rannazzisi's testimony would cover non-privileged, factual matters within his personal knowledge and limited to the scope of his prior Touhy authorization in the Case Track One ("CT1") multidistrict litigation ("MDL"), dated December 10, 2018.

As demonstrated by Mr. Rannazzisi's prior deposition testimony in CT1 of the MDL, Mr. Rannazzisi's testimony goes to issues at the heart of the litigation. Plaintiffs contend that Defendants failed to maintain effective controls to prevent diversion and to detect, report, and reject suspicious orders of opioids, creating a public nuisance and causing other grave harm to the City of Huntington and Cabell County. As Deputy Assistant Administrator of the Office of Diversion Control, Mr. Rannazzisi was directly and personally involved in interacting with DEA registrants about their obligations with respect to suspicious orders and in interpreting and enforcing federal law regarding diversion and suspicious order monitoring. He also has direct and personal knowledge of DEA's policies and practices relating to suspicious order reports, ARCOS data, and quotas for opioids.

Given prior correspondence and hearings on these issues, I have not restated all of the relevant history and justifications for this request for Mr. Rannazzisi's appearance. Please let me know if you have any concerns or objections.

Sincerely,

Linda Singer



September 29, 2020

Re: CT2 Plaintiffs' Touhy Letter regarding Trial Subpoena

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cc: All Plaintiffs' Counsel, mdl2804discovery@motleyrice.com
CT2 Defendants' Counsel, track2opioiddefendants@reedsmith.com
Anne McGinness Kearse, akearse@motleyrice.com
Paul T. Farrell, Jr., paul@farrell.law
Kelly Phipps, Kelly.E.Phipps@usdoj.gov
David Sobotkin, David.M.Sobotkin@usdoj.gov
Jonathan Hoerner, Jonathan.K.Hoerner@usdoj.gov